

# **Exhibit 17**

**From:** [Ross, David E.](#)  
**To:** [Magee, Jessica B \(DFW - X61375\)](#); [Mascianica, Scott \(DAL - X62106\)](#)  
**Cc:** [Yarm, Alexander R.](#)  
**Subject:** RE: MC+HK Call  
**Date:** Monday, August 14, 2023 5:12:49 PM  
**Attachments:** [RE Archer Rig #1 broke.msg](#)  
[Ex. 1 - Oil Rig Locations.pdf](#)  
[Ex. 2 - Letter to Archer re Filed UCC DLI 1.26.23.pdf](#)  
[Ex.3.pdf](#)  
[Ex# 4.pdf](#)  
[Ex. 5.pdf](#)  
[Ex. 6 - Purdy Oil - receipt of Wire from DLI for Rig 1 Purchase to be placed in Archer Drilling.pdf](#)  
[Ex. 8 - Engineering Report.pdf](#)

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Hi Jessica,

Thank you for taking the time to speaking with us on Saturday. We were pleased to hear that the Receiver is concerned about making sure that DLI's four oil drilling rigs are secure. We think we have a common interest here.

You asked for the locations of DLI's 4 oil drilling rigs. Please see the attached documents containing the location coordinates--one in Nevada (Rig 3), two and part of another in Nebraska (Rigs 1, 4 and Part of Rig 2), and a part of Rig 2 in Oklahoma. **See, Exhibit 1.**

We also attach the documents relating to the filing/recording of UCC-1 Financing Statement for 3 of the rigs (Rig 2, 3, and 4) financed by DLI for Archer Drilling LLC (which is an affiliate of DLI), including three (3) UCC-1s. **See Exhibits 2-5.** Another attorney for DLI handled the filing/recording of the UCC-1 Financing Statements in Nevada. **See supra, Exhibit 2.**

As to Rig 1, we wanted to advise you that that there has been ongoing litigation in Nebraska State Court concerning same. (Morrison Cohen is not involved in that litigation.) It is our understanding that one of the issues in that case is the ownership interest of Archer Drilling, which owns Rig 1. Additionally, as reflected in an April 4, 2022, bank wire, DLI paid \$125,000 to Purdy Oil for that rig. **See Exhibit 6.** Moreover, after Rig 1's mast broke (**see Exhibit 7** –the sole “non-PDF exhibit”, which contains pictures of Rig 1, with contemporaneous emails between DLI's principals and James Franklin), the insurance company for Archer Drilling issued an engineering report (Nov. 2022) on Rig 1. **See Exhibit 8.**

We are happy to answer any other questions regarding these rigs, but we respectfully submit that ensuring that the four (4) rigs (or parts thereof), which are all of substantial value, are not stolen, vandalized or otherwise damaged is of significant concern. As to that point and as we briefly discussed on our call, we have been advised that someone attempted to steal one of the rigs earlier this year.

In closing, inasmuch as you are now standing in the shoes of DLI, we respectfully request that you take any and all necessary actions forthwith to secure the rigs (and parts thereof) at the locations we provided.

We look forward to working with you.

Thank you.

-Dave

**David E. Ross**

*Partner*

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**From:** Magee, Jessica B (DFW - X61375) <[Jessica.Magee@hklaw.com](mailto:Jessica.Magee@hklaw.com)>

**Sent:** Saturday, August 12, 2023 11:19 AM

**To:** Ross, David E. <[dross@morrisoncohen.com](mailto:dross@morrisoncohen.com)>; Mascianica, Scott (DAL - X62106)

<[Scott.Mascianica@hklaw.com](mailto:Scott.Mascianica@hklaw.com)>

**Cc:** Yarm, Alexander R. <[ayarm@morrisoncohen.com](mailto:ayarm@morrisoncohen.com)>

**Subject:** RE: MC+HK Call

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Nope, I'm good—having a work call is a nice “have to” buffer to return these fine ladies to their legal custodians.

---

**From:** Ross, David E. <[dross@morrisoncohen.com](mailto:dross@morrisoncohen.com)>

**Sent:** Saturday, August 12, 2023 10:12 AM

**To:** Magee, Jessica B (DFW - X61375) <[Jessica.Magee@hklaw.com](mailto:Jessica.Magee@hklaw.com)>; Mascianica, Scott (DAL -

X62106) <[Scott.Mascianica@hklaw.com](mailto:Scott.Mascianica@hklaw.com)>

**Cc:** Yarm, Alexander R. <[ayarm@morrisoncohen.com](mailto:ayarm@morrisoncohen.com)>

**Subject:** RE: MC+HK Call

*[External email]*

Jessica,

If easier, Monday morning at your convenience works.

**David E. Ross**

*Partner*

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----- Original message -----

From: "Ross, David E." <[dross@morrisoncohen.com](mailto:dross@morrisoncohen.com)>  
Date: 8/12/23 10:54 AM (GMT-05:00)  
To: "Magee, Jessica B (DFW - X61375)" <[Jessica.Magee@hklaw.com](mailto:Jessica.Magee@hklaw.com)>, "Mascianica, Scott (DAL - X62106)" <[Scott.Mascianica@hklaw.com](mailto:Scott.Mascianica@hklaw.com)>  
Cc: "Yarm, Alexander R." <[ayarm@morrisoncohen.com](mailto:ayarm@morrisoncohen.com)>  
Subject: RE: MC+HK Call

Ha! Ok! As a father of a 6 year old girl who had friends over until 10 pm last night I feel your pain!

**David E. Ross**

*Partner*

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----- Original message -----

From: "Magee, Jessica B (DFW - X61375)" <[Jessica.Magee@hklaw.com](mailto:Jessica.Magee@hklaw.com)>  
Date: 8/12/23 10:48 AM (GMT-05:00)  
To: "Ross, David E." <[dross@morrisoncohen.com](mailto:dross@morrisoncohen.com)>, "Mascianica, Scott (DAL - X62106)" <[Scott.Mascianica@hklaw.com](mailto:Scott.Mascianica@hklaw.com)>  
Cc: "Yarm, Alexander R." <[ayarm@morrisoncohen.com](mailto:ayarm@morrisoncohen.com)>  
Subject: Re: MC+HK Call

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Done. I'll send a zoom link soon—finishing up hosting my daughter's tenth bday slumber party and doing some serious multi-tasking.

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**From:** Ross, David E. <[dross@morrisoncohen.com](mailto:dross@morrisoncohen.com)>  
**Sent:** Friday, August 11, 2023 7:54:48 PM  
**To:** Magee, Jessica B (DFW - X61375) <[Jessica.Magee@hklaw.com](mailto:Jessica.Magee@hklaw.com)>; Mascianica, Scott (DAL - X62106) <[Scott.Mascianica@hklaw.com](mailto:Scott.Mascianica@hklaw.com)>  
**Cc:** Yarm, Alexander R. <[ayarm@morrisoncohen.com](mailto:ayarm@morrisoncohen.com)>  
**Subject:** RE: MC+HK Call

*[External email]*

Thanks. Can you add Alex Yarm copied hereto?

**David E. Ross**  
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From: "Magee, Jessica B (DFW - X61375)" <[Jessica.Magee@hklaw.com](mailto:Jessica.Magee@hklaw.com)>  
Date: 8/11/23 7:24 PM (GMT-05:00)  
To: "Mascianica, Scott (DAL - X62106)" <[Scott.Mascianica@hklaw.com](mailto:Scott.Mascianica@hklaw.com)>, "Ross, David E." <[dross@morrisoncohen.com](mailto:dross@morrisoncohen.com)>  
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